

October 22, 2018

California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833-2936

RE: Support for OSFM Proposed changes CRC-Item 4, CBC-Item 17 & CCR: Flammability Standards for Building Insulation Materials

Dear Members of the California Building Standards Commission:

We represent architecture and design firms who specialize in sustainable and green design. Increasingly, our clients' building requirements include the use of healthy and safe materials and products, which do not contain harmful chemicals whenever possible.

We are writing today to express our support for the California State Fire Marshal's proposal, "Flammability Standards for Building Insulation Materials", which would change the California Building Code, California Residential Code, and California Code of Regulations to permit us to specify polystyrene building insulation without added flame retardants in sub-grade applications.

Flame retardants used in building insulation have been linked to some alarming human health concerns, including neurological and reproductive impairment, cancer, and hormone disruption. These chemicals could affect construction workers, materials manufacturers, and materials handlers, as well as the eventual buildings' occupants. While we design our buildings to be fire-safe, we also seek to reduce exposure to toxic chemicals whenever possible. We believe this code change proposal offers a perfect opportunity to meet both goals.

A 2017 report by the State Fire Marshal clearly shows that below-grade polystyrene insulation without added flame retardants has comparable fire safety to insulation with flame retardants. Without a fire safety benefit, there is no reason for these toxic chemicals to be added to this material. Removing them from below-grade uses would reduce potential human and environmental harm throughout the lifecycle of the insulation—which would increase public safety.

We are always looking for ways to meet the increasing demand from our clients for products free from chemicals of concern, especially where they do not provide a substantial increase in safety or performance. Our firms would like to have the choice to specify an insulation product that is both safe from fire risks and does not contain harmful flame retardants.

We urge the California Building Standards Commission to approve the OSFM's proposed changes to Flammability Standards in Building Insulation Materials, to allow us the option to choose less toxic materials.

Sincerely,

Mike Manzi, Associate Principal
Bora Architects

Jean Hansen, Principle
Sustainable Principle

Anne Hicks Harney, Principal
Long Green Specs

Jean Carroon, Principal
Goody Clancy

CC: Chief Dennis Mathisen, CA Office of the State Fire Marshal